## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE CHATTANOOGA DIVISION

TERPSEHORE MARAS,	
Plaintiff,	)
v.	<ul><li>) Civil Action No. 1:21-cv-00317</li><li>) Judge Clifton L. Corker</li></ul>
CHATTANOOGA NEWS CHRONICLE;	)
THEHUFFINGTONPOST.COM, INC.;	)
REPRESENTATIVE STEVE COHEN,	)
U.S.; DOMINION, INC.; DOMINION	)
<b>VOTING SYSTEMS, INC.; DOMINION</b>	)
<b>VOTING SYSTEMS CORPORATION;</b>	)
MEDIA MATTERS FOR AMERICA;	)
OHIO INTELLIGENCE TIPS; ROSS	)
ELDER; ALI ABDUL RAZAQ AKBAR	)
a/k/a ALI ALEXANDER,	)
	)
Defendants.	)

## NOTICE OF SPECIAL APPEARANCE

Robb S. Harvey, a Tennessee attorney with the law firm of Waller Lansden Dortch & Davis, LLP, hereby enters this Notice of Special Appearance ("Notice") for Defendant TheHuffingtonPost.com, Inc. (mis-identified as THEHUFFINGTONPOST, INC.)

This Notice is submitted without waiver of any defenses (including, but not limited to, personal or subject matter jurisdiction, venue, failure to state a claim, failure to name a proper party, improper "defendant," statute of limitations, or insufficiency of service), objections, rights or claims (including, but not limited to, their rights/protections under state and federal law and the federal and state Constitutions, such as the First Amendment to the United States Constitution, the Tennessee Constitution and any other applicable state constitution(s), and any applicable anti-

SLAPP (Strategic Litigation Against Public Participation) statutes such as the Tennessee Public Participation Act and/or New York's revised anti-SLAPP statute.

Plaintiff, through counsel, consented to an extension of time to and including January 18, 2022, for this Defendant to answer or otherwise respond while the case was pending in state court.

Respectfully submitted,

s/ Robb S. Harvey

Robb S. Harvey (Tenn. BPR No. 011519) WALLER LANSDEN DORTCH & DAVIS, LLP 511 Union Street, Suite 2700 Nashville, TN 37219 (615) 244-6380 robb.harvey@wallerlaw.com

Special Appearance for Defendant TheHuffingtonPost.com, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2022, a copy of the foregoing was filed via the Court's CM/ECF system which is anticipated to send electronic mail notice to the following:

Russell A. Newman The Newman Law Firm 6688 Nolensville Road, Suite 108-22 Brentwood, Tennessee 37027 russell@thenewmanlawfirm.com

Chattanooga News Chronicle 611 E. Martin Luther King Blvd. Chattanooga, Tennessee 37403 bell.hobbslaw@gmail.com

Rodney Eldredige aka Ross Elder 2911 Beaumont Avenue NW Massillon, Ohio 44647 Elder.ross.writes@gmail.com

Scott Sims & Michael R. O'Neill Sims/Funk, PLC 3322 West End Avenue #200 Nashville, Tennessee 37203 ssims@simsfunk.com moneill@simsfunk.com

Todd B. Tatelman Office of General Counsel U.S. House of Representatives 5140 O'Neill House Office Building Washington, D.C. 20515 Todd.Tatelman@mail.house.gov

## And a copy was served via first-class U.S. mail, addressed to:

Media Matters for America 75 Broadway Street, Suite 202 San Francisco, California 94111 Ali Abdul Razaq aka Ali Alexander 5125 Pinellas Avenue Keller, Texas 76244

s/ Robb S. Harvey

Special Appearance for Defendant TheHuffingtonPost.com, Inc.